

THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

SHARON ORTIZ ALAMO

DEBTOR

CASE NO. 21-01666/MCF

CHAPTER 13

**DEBTOR'S MOTION FOR EXTENSION OF TIME  
TO REPLY TO *TRUSTEE'S MOTION TO DISMISS*, DOCKET NO. 41**

TO THE HONORABLE COURT:

**NOW COMES, SHARON ORTIZ ALAMO**, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On December 22, 2021, the Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, Docket No. 41, alleging that the Debtor has defaulted in her Plan payments in the sum of \$1,434.00.

2. The Debtor hereby respectfully states that the Debtor has been unable to meet with her undersigned attorney in order to adequately reply to the *Trustee's Motion to Dismiss*, Docket No. 41.

3. The Debtor respectfully requests additional time of thirty (30) days to within to meet with the undersigned attorney, provide for the Plan arrears and file a reply to the *Trustee's Motion to Dismiss*, Docket No. 41. This extension of time to expire on February 18, 2022.

**WHEREFORE**, based on the above stated, the Debtor respectfully prays that the Honorable Court grant the present and grand the requested extension of time to reply to the *Trustee's Motion to Dismiss*, Docket No. 41.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to: the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to the debtor to her address of record.

**RESPECTFULLY SUBMITTED**, in San Juan, Puerto Rico, this 19<sup>th</sup> day of January, 2022.

**/s/ Roberto Figueroa Carrasquillo**  
RFIGUEROA CARRASQUILLO LAW OFFICE PSC  
USDC #203614  
ATTORNEY FOR PETITIONER  
PO BOX 186 CAGUAS PR 00726  
TEL NO 787- 744-7699/787-963-7699  
Email: [rfc@rfigueroalaw.com](mailto:rfc@rfigueroalaw.com)